

inherently described in a single prior art reference. ... ‘The identical invention must be shown in as complete detail as contained in the ... claim.’ The elements must be arranged as required by the claim.” (citations omitted, emphasis supplied). As will be seen, neither Rogers et al. nor Stephens et al. meet this rigid requirement.

5 Rogers et al. describe a call management system operative in conjunction with a digital data network. The management system intercepts incoming calls and controls the handling of the calls according to instructions received from end user workstations. Each call type (e.g., voice, fax or data) is managed separately and automatically through direct user workstation controls and/or user-generated rules that provide special treatment for designated callers. According to
10 the Examiner, the called party identification feature (column 11, lines 21-39) and voicemail transfer feature (column 44, lines 44-57) are together alleged to correspond to the “detecting” function (see, e.g., claim 1). This contention is incorrect, however.

The Examiner is reminded that claim 1 refers to a “method for processing an enterprise message,” which the claim later defines as a construct that comprises “a voice message and
15 categorization data, the categorization data elicited from a user during an interactive session in which the voice message is received from the user, the categorization data specifying associations between the enterprise message and information maintained in a data system.” Thus, according to the express claim language, the enterprise message is not simply a voice message itself, but rather includes the voice message and the categorization data. Moreover, the
20 categorization data must specify “associations between the enterprise message [that includes the voice message] and information maintained in a data system.”

Moreover, the ordinary and customary meaning of “categorizing” is to assign information into groups, classes or types; thus, one of ordinary skill in the art would interpret “categorization data” here as referring to information that says something about the content of the voice message,
25 not the manner in which the message is processed (e.g., routed). That “categorization data” relates to what the voice message is about – as opposed to where it is going or when it should be delivered – is evident from the other language in the claim, namely, that such categorization data must “specify associations between the enterprise message and information maintained in a data system.” The written description also makes this distinction clear by recognizing that message

handling information (such as routing data) may “augment the categorization data,” but is not part of that data. (See, e.g., page 8, lines 27-31).

As used in the claims, “categorization data” is user-elicited information that is used to classify the message according to its content. While that categorization data can then be used to facilitate an action once a rule is triggered by that data, the categorization data itself does not define how or when the enterprise message (or any component thereof) is routed through any enterprise system.

Rogers et al. describe a call processing system, not a voice messaging system. In Rogers et al., the incoming call is processed and a determination is made whether to send that call to voicemail; however, the voice message itself is never categorized, let alone by data received from the user during an interactive session. In Rogers et al., the called party identification feature simply facilitates the call routing function by capturing an identifier (name or extension) for the called party. The system then uses the identifier to find or verify the called party’s extension from a call management database. Thus, even if this database is considered a “data system,” in Rogers et al. the information elicited from the caller (e.g., the called party’s name or extension) does not categorize anything. At most, the information routes the voice message to the appropriate voice mailbox. There is no “enterprise message” created by this well-known routing function, and the caller identification function does not generate data that categorizes the voice message at all, let alone by “specifying associations between the [] message and information maintained in a data system.”

As Rogers et al. do not provide for an “enterprise message” in the manner recited, they do not meet the additional requirements (e.g., in claim 1) of “determining whether the categorization data for the enterprise message satisfy [] conditional criteria,” and, if so, “performing the action ...,” which includes “specifying modifications to information in the data system identified by the categorization data.” With respect to the latter requirement, the called party information elicited from the calling party does not control or facilitate any function other than voice message routing; in other words, such information does not facilitate an action that specifies “modification to information in the data system.” These are express limitations in the claims and all such limitations must be met within the four corners of the reference in order for anticipation to be

made out. For at least these reasons, Rogers et al. cannot anticipate any of independent claims 1, 9, 17 or 25. See, MPEP §2131.

Likewise, the Stephens et al. patent does not anticipate any independent claim. The inventors there describe a conventional voice mail system that is enhanced to allow a calling party to specify a time of delivery for a voice message. At the outset, as noted above, the present invention does not claim or concern any particular technique for message delivery. When a calling party in Stephens et al. specifies a delivery time, he or she (like in Rogers et al.) is just telling the voice mail system how (namely, when) to route the voice message. This is not the same as having the user “categorize” the [enterprise] message and, in particular, by “specifying associations between the enterprise message and information maintained in a data system.”

Stated another way, delivery schedule data does not, without more, have anything to do with the content of the message, and it does not “categorize” the message, which is what these claims require. Moreover, as noted above, representative claim 1 further requires that “if the categorization data satisfy [a] conditional criteria,” a given action is performed, and that action specifies “modifications to information in the data system identified by the categorization data.” In Stephens et al., the delivery schedule data elicited from the calling party does not facilitate the given action being performed, where the action “specifies modifications to information in the data system.” Once again, the reference fails to meet all claim limitations and, as a consequence, it cannot anticipate.

Both Rogers et al. and Stephens et al. simply elicit routing or delivery data from a calling party to facilitate control over a voicemail system. The resulting information, however, is not “categorization data” and, thus, the references do not meet all of the limitations in any independent claim. The anticipation rejection of claims 1, 6-7, 14-15, 17, 22-23 and 25 must be withdrawn for these reasons.

Further, each independent claim also requires, among other limitations, “detecting an occurring event for [the] enterprise message, [and] determining whether the occurring event matches [a] triggering event for [a] selected rule [and,] if the occurring event matches a triggering event for the selected rule, determining whether the categorization data for the enterprise message satisfy [] conditional criteria specified by the selected rule.” As noted above,

neither Rogers et al. nor Stephens et al. discloses or suggests the construct of an "enterprise message" having "categorization data" and, as a consequence, these references cannot disclose or suggest particular steps that are associated explicitly with such a message and such data.

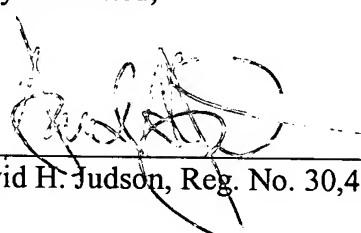
Anticipation, as noted above, requires that a prior art reference track the claim language of any rejected claim fully. This is not the case here for either of the cited patents.

An Information Disclosure Statement is included. This Statement includes art cited in a companion case, Serial No. 10/035,407, now U.S. Patent No. 6,778,644. A \$180 filing fee for submission of this Statement is included.

A Notice of Allowance is respectfully requested.

Respectfully submitted,

By:


David H. Judson, Reg. No. 30,467